

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 20cr10293
)	
v.)	Violations:
)	
RAMON ANTONIO HICIANO,)	<u>Count One</u> : False Representation of Social
)	Security Number; Aiding and Abetting
Defendant)	(42 U.S.C. § 408(a)(7)(B); 18 U.S.C. § 2)
)	
)	<u>Counts Two through Four</u> : Theft of Government
)	Money
)	(18 U.S.C. § 641)
)	
)	<u>Count Five</u> : Aggravated Identity Theft
)	(18 U.S.C. § 1028A(a)(1))
)	
)	<u>Forfeiture Allegation</u>
)	(18 U.S.C. § 981(a)(1)(C) and
)	28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

False Representation of Social Security Number;
Aiding and Abetting
(42 U.S.C. § 408(a)(7)(B); 18 U.S.C. § 2)

The Grand Jury charges:

On or about November 17, 2016, in the District of Massachusetts, the defendant,

RAMON ANTONIO HICIANO,

for the purpose of obtaining anything of value from any person, and for any other purpose, did,
with intent to deceive, falsely represent a number to be the social security account number
assigned by the Commissioner of Social Security to him on a final application for housing
submitted to the Boston Housing Authority, when in fact, such number is not the social security
account number assigned by the Commissioner of Social Security to him.

All in violation of Title 42, United States Code, Section 408(a)(7)(B), and Title 18,
United States Code, Section 2.

COUNT TWO
Theft of Government Money
(18 U.S.C. § 641)

The Grand Jury further charges:

From in or about December 2016, and continuing through in or about October 2020, in the District of Massachusetts, the defendant,

RAMON ANTONIO HICIANO,

did, on a recurring basis, knowingly and willfully embezzle, steal, purloin, and convert to his use and the use of another, any money and thing of value of the United States and of any department and agency thereof, in a total amount greater than \$1,000, namely, Section 8 housing assistance benefits.

All in violation of Title 18, United States Code, Section 641.

COUNT THREE
Theft of Government Money
(18 U.S.C. § 641)

The Grand Jury further charges:

From in or about January 2016, and continuing through in or about August 2020, in the District of Massachusetts, the defendant,

RAMON ANTONIO HICIANO,

did, on a recurring basis, knowingly and willfully embezzle, steal, purloin, and convert to his use and the use of another, any money and thing of value of the United States and of any department and agency thereof, in a total amount greater than \$1,000, namely, MassHealth benefits.

All in violation of Title 18, United States Code, Section 641.

COUNT FOUR
Theft of Government Money
(18 U.S.C. § 641)

The Grand Jury further charges:

In or about May 2020, in the District of Massachusetts, the defendant,

RAMON ANTONIO HICIANO,

did, on a recurring basis, knowingly and willfully embezzle, steal, purloin, and convert to his use and the use of another, any money and thing of value of the United States and of any department and agency thereof, in a total amount greater than \$1,000, namely, Pandemic Unemployment Assistance benefits.

All in violation of Title 18, United States Code, Section 641.

COUNT FIVE
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

On or about November 17, 2016, in the District of Massachusetts, the defendant,

RAMON ANTONIO HICIANO,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, False Representation of Social Security Number, in violation of 42 U.S.C. § 408(a)(7)(B), as charged in Count One.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

FORFEITURE ALLEGATION
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

The Grand Jury further finds:

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 641, set forth in Counts Two through Four, the defendant,

RAMON ANTONIO HICIANO,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, the following asset:

- a. \$84,610.30 in United States currency, to be entered in the form of a forfeiture money judgment.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:


FOREPERSON OF THE GRAND JURY


KAREN BURZYCKI
SPECIAL ASSISTANT U.S. ATTORNEY

District of Massachusetts: NOVEMBER 19, 2020

Returned into the District Court by the Grand Jurors and filed.

/s/ Thomas F. Quinn 11/19/20 @ 4:05pm
DEPUTY CLERK